

**LAW OFFICES OF
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Attorneys for Defendant, George T. Szymczak, Esq.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

BARBARA URBAS,

Plaintiff(s),

vs.

B. FILIPCZAK, M.D., ET AL.,

Defendant(s).

Civil Action No: 2:17-CV-13039-KM-JBC

ANSWER TO COMPLAINT, DEMAND
FOR ALLOCATION, DEMAND FOR
STATEMENT OF DAMAGES,
DESIGNATION OF TRIAL COUNSEL

I, George T. Szymczak, Esq., by way of answer to the Plaintiff's Complaint say:

1. This Defendant makes no response to Defendant's statement of claim, except as to paragraph C, number 6, which is denied, I never represented Plaintiff, nor possessed a file of hers.

SEPARATE DEFENSES

1. Plaintiff's claim is barred by the applicable Statute of Limitations and is not timely filed.

2. Plaintiff's Complaint lacks to state a cause of action against this Defendant.

DEMAND FOR ALLOCATION PURSUANT TO R.4:7-5(c)

If any co-defendant settles prior to trial, this Defendant will seek an allocation of the percentage of negligence assessed by the fact finder against the settling Defendant. This Defendant will seek this allocation, whether or not they have formally filed a

Crossclaim against the settling Defendant. This Defendant may rely on the examination and cross-examination of expert witnesses at the time of trial in support of this demand of allocation. All counsel are hereby apprised pursuant to R. 4:7-5(c) and Young vs. Latta 123 N.J. 584 (1991).

DEMAND FOR STATEMENT OF DAMAGES

Defendant, George T. Szymczak, Esq., demands that Plaintiff, within (5) days after service hereof, shall furnish them with a written statement of the amount of damages claimed in this action.

DESIGNATION OF TRIAL COUNSEL

George T. Szymczak, Esq. is designated as trial counsel for Defendant, George T. Szymczak, Esq.

LAW OFFICES OF
GEORGE T. SZYMCHAK, LLC
Attorney for Plaintiff(s)

DATED: April 6, 2018

BY: 

GEORGE T. SZYMCHAK, ESQ.